DSL Internet Corporation 5000 SW 75th Av 3rd FLR Miami, FL 33155

Federal Communications Commission

Washington,	DC 20554
In the Matter of:) Case No.: WC DOCKET NO 05-196
E911 Requirements for IP-Enabled	Petition for Extension of Time to
Service Providers	Comply with the E911 Requirements for
) IP-Enabled Service Providers

DSL Internet Corporation hereby petitions the Federal Communications Commission ("Commission"), pursuant to Public Notice released on July 26th 2005 regarding the Enforcement Bureau's notification provisions of the FCC rules governing enhanced 911 capabilities for an extension of time to comply with the assistance capability requirements. DSL Internet Corporation specifically requests an extension of the compliance date to August 29th, 2005 to the "911 Act" as DSL Internet's operating systems reflecting VoIP customers was not available for integration into the required format for notification to VoIP customers by quantity of device and location.

BACKGROUND

The Public Notice permits a carrier to seek, and the Commission to grant, an extension of the compliance date "if providers meets the reporting requirements outlined: The report to the Commission should include:

 A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e., e-mail, U. S. mail);

- 2) A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005;
- 3) A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e., e-mail, U. S. mail);
- 4) A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above;
- 5) A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005;
- 6) A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers; and
- 7) The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the VoIP E911 Order.

CARRIER COMPLAINCE EFFORTS

In accordance with the above, DSL Internet Corporation has worked in good faith with its programming team to produce the required list of devices and customers impacted by this order and establish the plans and processing for making its subscribers aware of the 911 issues relating to VoIP services in order to meet the deadline established in

the *Extension Order*. As of August 10th 2005, the following reflects DSL Internet's initiatives, plans and actions to comply with this order according to reference number stated above:

#1: As per this requirement, DSL Internet has established email notifications that are being sent to all impacted subscribers which are designated to be distributed on 8/11/05 advising customers of the 911 limitations and contact information for further information which is drafted in both English and Spanish. Letters are also being sent to these customers with return address envelopes mandating clients to affirm their understanding of the 911 services offered by DSLi and detailing consequences for non-compliance. A copy of said letter is attached.

As previously stated, DSL Internet has been working diligently in ensuring that the list of subscribers and devices have been accurately identified and programming has been corrected to ensure all impacted customers are included in this distribution which has resulted in this delay of notification.

#2: As of August 10, 2005, 100% of our clientele base have not remitted the affirmative acknowledgement forms as they have not been supplied with the notifications, but will be as planned in #1. It is anticipated that 20% of our entire customer base will not remit the acknowledgements by August 29, 2005 but, DSLi expects all its customers to return acknowledgments once it commences suspending services.

- #3: DSL Internet has requisitioned the production of notification stickers to be distributed to all customers by quantity of devices per location to be placed on each device indicating the limitation of VoIP 911 capabilities with a company contact number for further information. DSL Internet Corporation is anticipating the distribution and delivery of these stickers to all customers impacted prior to August 29, 2005. These warning stickers will be sent to each client via US post, customers are being notified to expect these warning labels in the notification letter being sent as per #1.
- **#4:** The quantification of subscribers, on a percentage base, that we will not be notifying and/or providing warning stickers to as per requirement #1 above is 0%.
- #5: In the event that subscribers do not remit affirmative acknowledgement proclaiming their receipt and understanding the advisory notifications by August 17th 2005, DSL Internet representatives will be contacting each customer telephonically and via email reminding them that they will be subject to suspension and/or disconnection due to non-compliance on August 30, 2005. If, in the event, said subscribers have not remitted said acknowledgements by August 22, 2005, DSL Internet will be sending certified mailers to these customers advising that we are going to be disconnecting their services on August 30th due to their non-compliance.

#6 In order to maintain the listing of customers that would be subject to the above, DSL Internet Corporation has created a separate database matrix identifying all VoIP subscribers, itemizing notifications sent and acknowledgements received and action taken for customers who have not complied.

#7 The following is the authorized representative that is designated to DSL Internet Corporation for VoIP 911 Compliance:

Mark Harris, CFO

5000 SW 75th Ave, 3rd FLR

Miami, FL 33155

305-779-5707

markh@dsli.com

DSL Internet has conclusively shown that it is working diligently in acting on the requirements of the VoIP 911 Compliance Order and its compliance dates. Accordingly, an extension of time until August 30, 2005 should be granted.

Dated this 10^{th} day of August, 2005

By:

Mark Harris, CFO
DSL Internet Corporation
5000 SW 75th Av
3rd FLR
Miami, FL 33155

Tel:305.779.5741 Fax: 305.779.4329

Email version:

Dear Customer,

IMPORTANT INFORMATION PLEASE READ AND RESPOND TO AVOID

DISTRUPTION TO YOU TELEPHONE SERVICE

FEDERAL COMMUNICATIONS COMMISSION (FCC)

Registered Location Requirement

The FCC recently mandated DSLi, and other VoIP providers, to obtain from each of its customers the physical location at which their VoIP services are to be utilized. Failure of customers to confirm this information to their provider may cause an interruption of service. Please follow the instructions in this letter and respond to DSLi using the enclosed envelope by 22nd August 2005 to avoid disruption of service.

In addition, the FCC requires providers to explain the circumstances under which E911 service may not be available.

DSLi provides a full E911 service for its VoIP customers who utilize DSLi's service at their Registered Location where that location is within the Florida South East (460) LATA (see enclosed map). DSLi DOES NOT provide VoIP service, except in the Florida South East (460) LATA, therefore all Registered Locations must be within the area covered by the enclosed Map.

Your Registered Location is the existing location of your telephone lines as detailed in this letter and as confirmed in your required response to this letter.

TO AVOID POTENTIAL INTERRUPTION TO YOUR SERVICES THE FCC MANDATES THAT YOU CONFIRM THIS LOCATION TO YOUR PROVIDER.

Follow these instructions to confirm your Registered Location to DSLi by 22nd August 2005.

If you wish to modify your Registered Location, please follow the enclosed instructions. On receipt of your response, DSLi will process your address modification and notify you via e-mail of the successful modification/confirmation of your Registered Location. Until this point, your 911 Registered Location has not been revised. After receipt of confirmation of your Registered

Location DSLi will also dispatch stickers for you to place on or near to your phones warning the user of potential 911 limitations.

We thank you for your prompt attention to this notice.

Regards,

DSLi Customer Services

307 779 7777 Extension. 2

YOUR REGISTERED LOCATIONS

[Customer Name]

[Account Number]

Print and review the listing below, amend any locations if necessary, sign and return to DSLi at 5000 SW $75^{\rm th}$ Ave. Miami, Fl 33155 or Fax to 305 779 4329.

Registered Location	New Registered Location
[service address]	
As Above	
As Above	
	[service address] As Above

I confirm that I have read and understood the limitations of DSLi's E911 service as detailed on the e-mail of $11^{\rm th}$ August 2005.

I further confirm that the above addresses are the Registered Locations within the Florida South East (460) LATA of the respective telephone numbers. Where amended I instruct DSLi to update the Registered Location to New Registered Locations above. The modification of this

Registered Location is deemed completed by DSLi upon notification to the Primary Contact below via e-mail.

I further confirm that the Primary Contact details below are correct as detailed or amended.

Mark Harris	
Name	Signature
CFO	
Title	Date

PRIMARY CONTACT DETAILS

	EXISTING INFORMATION	REVISED INFORMATION
Primary Contact	[NAME FROM MAX]	
Name		
Primary Contact	[NAME FROM MAX]	
Phone		
Primary Contact	[E-MAIL FROM MAX]	
E-Mail		

DSL Internet Corporation

5000 SW 75th Ave.

Miami

Fl 33155

[Customer Billing Address]

[Customer Billing Address]

[Account Number]

12th August 2005

Dear Customer,

IMPORTANT INFORMATION PLEASE READ AND RESPOND TO AVOID

DISTRUPTION TO YOU TELEPHONE SERVICE

FEDERAL COMMUNICATIONS COMMISSION (FCC)

Registered Location Requirement

The FCC recently mandated DSLi, and other VoIP providers, to obtain from each of its customers the physical location at which their VoIP services are to be utilized. Failure of customers to confirm this information to their provider may cause an interruption of service. Please follow the instructions in this letter and respond to DSLi using the enclosed envelope by 22nd August 2005 to avoid disruption of service.

In addition, the FCC requires providers to explain the circumstances under which E911 service may not be available.

DSLi provides a full E911 service for its VoIP customers who utilize DSLi's service at their Registered Location where that location is within the Florida South East (460) LATA (see enclosed map). DSLi DOES NOT provide VoIP service, except in the Florida South East (460) LATA, therefore all Registered Locations must be within the area covered by the enclosed Map.

Your Registered Location is the existing location of your telephone lines as detailed in this letter and as confirmed in your required response to this letter.

TO AVOID POTENTIAL INTERRUPTION TO YOUR SERVICES THE FCC MANDATES THAT YOU CONFIRM THIS LOCATION TO YOUR PROVIDER.

Follow these instructions to confirm your Registered Location to DSLi by 22nd August 2005.

If you wish to modify your Registered Location, please follow the enclosed instructions. On receipt of your response, DSLi will process your address modification and notify you via e-mail of the successful modification/confirmation of your Registered Location. Until this point, your 911 Registered Location has not been revised. After receipt of confirmation of your Registered

Location DSLi will also dispatch stickers for you to place on or near to your phones warning the user of potential 911 limitations.

We thank you for your prompt attention to this notice. Regards,

DSLi Customer Services

307 779 7777 Extension. 2

YOUR REGISTERED LOCATIONS

Customer Name

Account Number

Review the listing below, amend any locations if necessary, sign and return to DSLi using the enclosed reply paid envelope by 22nd August 2005.

Telephone #	Registered Location	New Registered Location
[telephone #]	[service address]	
[telephone #]	As Above	
305 377 0168	As Above	

I confirm that I have read and understood the limitations of DSLi's E911 service as detailed on the letter of $12^{\rm th}$ August 2005.

I further confirm that the above addresses are the Registered Locations within the 460 LATA of the respective telephone numbers. Where amended I instruct DSLi to update the Registered Location to New Registered Locations above. The modification of this Registered Location is

deemed	completed	bу	DSLi	upon	notification	to	the	Primary	Contact	below
via e-r	nail.									

I further confirm that the Primary Contact details below are correct as detailed or amended.

Mark Harris	
Name	Signature
CFO	
Title	Date

PRIMARY CONTACT DETAILS

	EXISTING INFORMATION	REVISED INFORMATION
Primary Contact	[NAME FROM MAX]	
Name		
Primary Contact	[NAME FROM MAX]	
Phone		
Primary Contact	[E-MAIL FROM MAX]	
E-Mail		